



Pinkhasov & Associates, PLLC

Attorneys and Counselors at Law

September 28, 2023

Hon. Magistrate Judge Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Singh v. Barney's Service Station, Inc. et al
1:23-cv-03881 (NRM)(TAM)

Hon. Magistrate Judge Taryn A. Merkl:

This office represents defendants Barney's Service Station, Inc. and Anthony Panvini in the above matter. This Court previously set a deadline date of September 29, 2023 to provide the Court with a proposed settlement agreement. The parties have been working on the agreement in accordance with *Cheeks v. Freeport Pancake House, Inc.* However, we have not finalized the agreement and the attorney for the plaintiff, Daniel R. Oliveri, Esq., has informed me that he is on trial and that his client has been out of the country. As such, we are jointly respectfully requesting an extension of time to submit the proposed settlement agreement up to and including October 30, 2023. I have contacted the plaintiff's attorney, Daniel R. Olivieri, Esq., who joins in this application.

I thank you for your consideration in this matter.

Very truly yours,

Paul Felicione, Esq. (PF-7795)

Cc: Daniel R. Olivieri, Esq.
(By ECF)